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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

NAWSHEEN DUFFAYDAR,  
Individually and on behalf all others  
similarly situated,

Plaintiff,

v.

SONDER HOLDINGS INC., FRANCIS  
DAVIDSON, CHRIS BERRY, and  
DOMINIQUE BOURGAULT,

Defendants.

Case No. 2:24-cv-02952-SB (JCx)  
[c/w: 2:24-cv-04798-MWF (JCx)]

**NOTICE OF RELATED CASES  
[CIVIL L.R. 83-1.3.1]**

Pursuant to Local Rule 83-1.3.1, Defendants Sonder Holdings, Inc. (“Sonder”), Francis Davidson, Chris Berry, and Dominique Bourgault (together, “Defendants”) hereby give notice that this action (the “*Duffaydar* Action”) is related to several other cases pending in this district.

First, this matter has been consolidated with another putative securities class action, *Park v. Sonder Holdings Inc., et al.*, Case No. 2:24-cv-04798-MWF (JCx) (C.D. Cal.) (the “*Park* Action”), which was filed on June 7, 2024 and consolidated with this action on October 9, 2024 (together with this action, the “Securities Class Action”). *See* Dkt. 40.

Second, this matter has previously been determined to be related to *Versen v. Davidson, et al.*, Case No. 2:25-cv-00761-MEMF (JCx) (the “*Versen* Action”), which was filed on January 28, 2025; *Akayli v. Davidson, et al.*, Case No. 2:25-cv-02060-AB (JCx) (the “*Akayli* Action”), which was filed on March 7, 2025; and *Hunter v. Aggarwal, et al.*, Case No. 2:25-cv-02352-ODW (JCx) (the “*Hunter* Action”), which was filed on March 17, 2025 (collectively, the “Derivative Actions”).

Prior to June 4, 2025, the Securities Class Action and Derivative Actions were all pending before The Honorable Otis D. Wright, II. On June 4, 2025, Judge Wright first recused himself from the *Duffaydar* Action, which has been re-assigned to Your Honor. Next, Judge Wright recused himself from the *Park* Action, the *Versen* Action, and the *Akayli* Action, and each of these cases was reassigned to a different judge.<sup>1</sup>

Under this Court’s Local Rules, cases are related: “(a) [if they] arise from the same or closely related transaction, happening, or event; (b) [if they] call for determination of the same or substantially related or similar questions of law and fact; or (c) for other reasons that would entail substantial duplication of labor if heard

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<sup>1</sup> The *Park* Action was reassigned to The Honorable Michael W. Fitzgerald. The *Versen* Action was reassigned to The Honorable Maame Ewusi-Mensah Frimpong. The *Akayli* Action was reassigned to The Honorable Andre Birotte Jr.

1 by different judges.” L.R. 83-1.3.1. The Securities Class Action and the Derivative  
2 Actions satisfy each of these criteria, as previously determined. *See* Dkt. 40; *Versen*  
3 *Action*, Dkt. 21; *Akcayli Action*, Dkt. 10; *Hunter Action*, Dkt. 14.

4 The Derivative Actions are all shareholder derivative actions purportedly  
5 brought on behalf of Sonder. The Securities Class Action and Derivative Actions  
6 are based on the same underlying events – the same alleged misstatements in  
7 Sonder’s SEC filings in fiscal years 2022 and 2023 relating to its accounting of lease  
8 provisions – and assert nearly identical causes of action. All of the Defendants in  
9 the Securities Class Action are also named in the Derivative Actions.

10 Accordingly, Defendants submit that the Securities Class Action and the  
11 Derivative Actions continue to be related for the purposes of Local Rule 83-1.3.1,  
12 and judicial economy would be served if each case was heard before this Court.

13  
14 DATED: June 5, 2025

Respectfully submitted,

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16 WILMER CUTLER PICKERING  
HALE AND DORR LLP

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18 By: /s/ Jessica Lewis  
Jessica Lewis  
19 *Attorneys for Defendants*  
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